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Response to OA of 10/05/04

Remarks

In the present response, three claims (1, 9, and 17) are amended, and five claims (25-29) are newly added. Claims 1-29 are presented for examination. Applicants believe that no new matter is entered.

I. Claim Rejections: 35 USC § 103

Claims 1, 3, 8, 9, 11, 16, 17, 19, and 24 are rejected under 35 USC § 103(a) as being unpatentable over USPN 6,073,135 (hereafter Broder). Applicants respectfully traverse.

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art cited must teach or suggest all the claim limitations. *See* M.P.E.P. § 2143. Applicants assert that the rejection does not satisfy these criteria.

Independent claims 1, 9, and 17 recite numerous limitations that are not taught or suggested in Broder. By way of example, claims 1, 9, and 17 recite (emphasis added):

encoding the respective row as an identifier for the identified reference row, if any, a set of **deletes representing page identifiers that identify pages** in the identified reference row not in the respective row, and a set of **adds representing page identifiers that identify pages** in the respective row not in the identified reference row.

The Office Action admits that "Broder does not explicitly teaches the step of encoding the respective row as an identifier ..." (see OA at p. 3). Applicants agree with this admission. The Office Action, however, states that it would have been obvious to modify Broder to teach the noted recitations. Applicants respectfully disagree.

The independent claims recite encoding the respective row as a set of deletes representing page identifiers that **identify pages** in the identified reference row not in the

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respective row, and as a set of adds representing page identifiers that **identify** pages in the respective row not in the identified reference row. By contrast, Broder teaches a list of encoded URLs (see Broder: FIG. 3, #340). Each entry in the list "is stored as a difference (delta) between the current URL and a previous URL" (see Col. 3, lines 57-63). Broder describes this teaching in more detail (see Col. 4, lines 13-18):

More precisely, each entry 341 of the list 340 includes the following fields: a size field 342 that indicates the number of common bytes with the previous URL; a delta field 343 that stores the bytes that are different than the shared prefix, terminated by a zero byte 344; finally, a field (Node ID) 345 identifies the node that represents the corresponding page.

Nowhere does Broder teach or suggest that a set of deletes and/or adds represent page identifiers that identify pages.

For at least these reasons, claims 1, 9, and 17 allowable over Broder. Dependent claims inherit the limitations of the base claim. Thus, for at least the reasons given in connection with claims 1, 9, and 17, all dependent claims are also allowable.

II. Claim Rejections: 35 USC § 103

Claims 2, 10, and 18 are rejected under 35 USC § 103(a) as being unpatentable over Broder in view of Shay "Understanding Data Communication & Networks" (hereafter Shay). Applicants respectfully traverse.

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art cited must teach or suggest all the claim limitations. See M.P.E.P. § 2143. Applicants assert that the rejection does not satisfy these criteria.

As noted in Section I above, Broder fails to teach or suggest all of the recitations of independent claims 1, 9, and 17. Shay fails to cure the noted deficiencies of Broder.

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Thus, for at least the reasons given in connection with Section I above, claims 2, 10, and 18 are allowable over Broder in view of Shay.

III. Allowable Subject Matter

Applicants sincerely thank the Examiner for allowing claims 4-7, 12-15, and 20-23 if rewritten as indicated in the Office Action.

IV. New Claims

Applicants present new claims 25-29. These claims contain numerous recitations that are not taught or suggested in the art of record. By way of example, Applicants emphasize some of these recitations in claim 25 below:

assigning identification numbers to universal resource locators (URLs) of web pages and to URLs of web links associated with the web pages;

arranging the identification numbers of the web pages in numerical order;
and

encoding web links associated with a particular web page as:

(1) a pointer to another identification number having a list of identification numbers **that identify web pages,**

(2) a list of delete numbers **that represent identification numbers** included in the list of identification numbers of the another identification number but not **associated as web links** with the particular web page, and

(3) a list of add numbers **that represent identification numbers** **associated as web links** with the particular web page but not included in the list of identification numbers of the another identification number.

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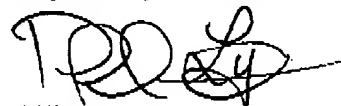
CONCLUSION

In view of the above, Applicants believe all pending claims are in condition for allowance. Allowance of these claims is respectfully requested.

Any inquiry regarding this Amendment and Response should be directed to Philip S. Lyren at Telephone No. (281) 514-8236, Facsimile No. (281) 514-8332. In addition, all correspondence should continue to be directed to the following address:

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CERTIFICATE UNDER 37 C.F.R. 1.8

The undersigned hereby certifies that this paper or papers, as described herein, are being facsimile transmitted to the United States Patent and Trademark Office number 703-872-9306 on this 4th day of January, 2005.

By

Name: Be Henry

